



Environmental Impact Assessment - Statement of Conformity: Ryebank, Chorlton

Full Application
Land at Ryebank Road, Chorlton

On behalf of Step Places, Southway Housing Trust and
Manchester Metropolitan University
August 2026

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1 INTRODUCTION

1.1 This Environmental Impact Assessment (“EIA”) Statement of Conformity supports a full planning application (Reference: 142223/FO/2025) submitted by Step Places, Southway Housing Trust and Manchester Metropolitan University (the Applicants), in respect of a Proposed Development on land off Ryebank Road, Chorlton (the “site”).

1.2 The site is 4.61 hectares, the majority of which is situated within the administrative area of Manchester City Council (MCC). A very small area (0.0156 hectares / 156.5 sqm) falls within the boundary of Trafford Metropolitan Borough Council (TMBC).

1.3 The Proposed Development seeks to secure full approval for a residential scheme. The description of development is as follows:

“Erection of a residential development comprising 120 dwellings (including a mix of housing types and tenures) together with open spaces, landscaping, sustainable drainage features, cycleways and pedestrian footways, vehicular accesses and highways, parking provision and other associated works.”

1.4 The planning application was submitted to MCC and TMBC seeking to secure full approval for a residential development in February 2025 and was accompanied by an ES (hereafter referred to as the ‘February 2025 ES’). Following additional comments received through the consultation process, an Environmental Statement Addendum was submitted in May 2026 (the ‘May 2026 ES Addendum’). Further work was undertaken in relation to the Ecology, Ground Conditions and Socio-economic assessments. In summary, the May 2026 ES Addendum confirmed that the likely significant effects as set out in the February 2025 ES remain valid and unchanged.

1.5 The February 2025 ES and May 2026 ES Addendum covered the following technical assessment areas:

- Ecology and Nature Conservation;
- Socio Economics and Health;
- Climate Change;
- Archaeology; and

- Ground Conditions.

- 1.6 The February 2025 ES and May 2026 ES Addendum, written in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations¹ ('the EIA Regulations'), provided an assessment of the likely significant effects of the development on the environment.
- 1.7 The purpose of this EIA Statement of Conformity is to consider whether a specific matter raised by an interested third party in correspondence sent directly to the Applicants (outlined in Section 2: Statement of Conformity) would alter the conclusions of the February 2025 ES and May 2026 ES Addendum.

¹ The Town and Country Planning (Environmental Impact Assessment (EIA)) Regulations 2017 (amended 2018)

2 STATEMENT OF CONFORMITY

- 2.1 The February 2025 ES assessed and identified the likely significant effects of the Proposed Development. The May 2026 ES Addendum addressed various consultee comments raised since submission of the application and further assessment work was undertaken.
- 2.2 The Applicant has received third party correspondence which refers a point regarding the interaction between made ground, contaminants and burrowing animals, notably badgers.
- 2.3 Considering the above, this EIA Statement of Conformity has been prepared to demonstrate that the effect of burrowing animals would not give rise to any additional likely significant effects, therefore confirming no further environmental information is required to be submitted pursuant to the EIA Regulations. Table 2.1 addresses each of the assessment topics included in the February 2025 ES and subsequent May 2026 ES Addendum to demonstrate that the assessment of likely significant effects remains as previously identified and that the assessment remains valid. The review is informed by a review undertaken by E3P as contained in Appendix 1.

Table 2.1: ES Compliance Review

Technical Discipline	Compliance Statement & Confirmation of whether Further Assessment is required
Ecology and Nature Conservation	Chapter 6 of the ES and ES Addendum provided an assessment of exposure to Badgers, as the receptor of relevance, to contaminated soils during the enabling and construction phase. It stated that <i>"In the case of contaminated soils, exposed during the earthworks, inclusion of prevention and avoidance measures within the CEMP, specifically focusing on safeguarding badgers to exposure of harmful chemicals during the earthworks process of the construction phase will be detailed. Equally, this can also be covered and accounted for in the badger licence"</i>. With mitigation, the ES concluded that the significance of effect is assessed as negligible and not significant. During the operational phase, the ES identified measures to mitigate the effect of new residents disturbing Badgers to be included in a Method Statement and secured by condition, including: 1) protective permanent fencing 2) designated paths 3) educational signage 4) community engagement 5) sensitive lighting design. With mitigation, the ES concluded that the significance of effect is assessed as minor adverse and not significant Further to the above, there have been no material changes to the baseline as outlined in the February 2025 ES and May 2026 ES Addendum. There are no changes to the methodology adopted within the February 2025 ES or Addendum. There are no additional requirements for mitigation. Subsequently, there are no changes to the Ecological assessment outlined within the February 2025 ES and May 2026 ES Addendum and the conclusions remain valid. No further assessment is required.

Socio Economics and Health	Chapter 7 of the February 2025 and May 2026 Addendum refers to Chapter 10 (Ground Conditions) in relation of health and wellbeing receptor. It states that with the implementation of the measures set out in the Contaminated Land Remediation Strategy, it is identified that the Site can be safely redeveloped. Furthermore, as set out below and within Appendix 1, no additional measures are required to mitigate the effects linked to human health due to badgers / burrowing animals. Therefore, there are no changes to the assessment outlined within the February 2025 ES and the May 2026 ES Addendum and the conclusions remain valid. Further to the above, there have been no material changes to the baseline as outlined in the February 2025 ES and May 2026 ES Addendum. There are no changes to the methodology adopted within the February 2025 ES or Addendum. There are no additional requirements for mitigation. Subsequently, there are no changes to the assessment outlined within the February 2025 ES and May 2026 ES Addendum and the conclusions remain valid. No further assessment is required.
Climate Change	There have been no material changes to the baseline as outlined in the February 2025 ES and May 2026 ES Addendum. There are no changes to the methodology adopted within the February 2025 ES or May 2026 Addendum. No updates are required to the assessment in relation to the potential effect of badgers / burrowing animals. There are no additional requirements for mitigation. Subsequently, there are no changes to the assessment outlined within the February 2025 ES and May 2026 ES Addendum and the conclusions remain valid. No further assessment is required.

Archaeology	There have been no material changes to the baseline as outlined in the February 2025 ES and May 2026 ES Addendum. There are no changes to the methodology adopted within the February 2025 ES or Addendum. No updates are required to the assessment in relation to the potential effect of badgers / burrowing animals. There are no additional requirements for mitigation. Subsequently, there are no changes to the assessment outlined within the February 2025 ES and May 2026 ES Addendum and the conclusions remain valid. No further assessment is required.
Ground Conditions	The February 2025 ES and May 2026 ES Addendum identified a comprehensive package of mitigation measures, including remediation of accessible asbestos-containing material (ACMs), validated clean cover systems, habitat retention areas, permanent protective fencing, managed access routes and long-term ecological management, all of which can be secured through suitably worded planning conditions. These measures are set out in Chapter 10 (Ground Conditions) and Chapter 6 (Ecology) of the February 2025 ES and May 2026 ES Addendum, and no new mitigation measures are required. In terms of the potential effect relating to badgers / burrowing animals, site observations indicate that badgers are not transporting material across the Site but are only exposing isolated fragments in close proximity to sett entrances. Consequently, any potential effect would be highly localised, limited in spatial extent and of very low likelihood. Overall, the magnitude of any residual effect associated with badger excavation is considered negligible and would therefore would not be considered significant. The mitigation measures set out above are deliverable and can be secured by a suitably worded

	planning condition. As such, there are no new likely significant effects, therefore the conclusions of the February 2025 ES and May 2026 ES Addendum remain valid. No further assessment is required.
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- 2.4 This Statement of Conformity has reviewed third party comments received by the Applicant with respect to Badgers/burrowing animals. A review of the comments has been undertaken to consider the potential for any new or amended significant effects to arise as a result of the proposals.
- 2.5 It was identified that there are no new or altered likely significant effects nor the requirement for any additional mitigation measures. Therefore, the assessment remains unchanged, and the findings of the February 2025 ES and May 2026 ES Addendum remain valid.
- 2.6 As noted previously, the February 2025 ES and May 2026 ES Addendum are considered under the 2017 EIA Regulations. Schedule 4 of the 2017 Regulations require that an Environmental Statement include *"A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape"*.
- 2.7 It is considered that these topics are robustly assessed within the February 2025 ES and May 2026 ES Addendum (where relevant and scoped-in to the assessment) and there are no changes required in terms of the scope of the EIA as presented in the February 2025 ES and May 2026 ES Addendum.
- 2.8 Regulation 25, (1) of the EIA regulations states the relevant planning authority may request 'additional information' to be submitted *"which is directly relevant to reaching a reasoned conclusion on the likely significant effects of the development described in the application in order to be an environmental statement"*, in order to satisfy the Regulations.
- 2.9 Regulation 25 of the EIA Regulations states:
- "in relation to which the applicant or appellant has submitted an environmental statement, and are of the opinion that, in order to satisfy the requirements of regulation 18(2) and (3), it is necessary for the statement to be supplemented with*

additional information which is directly relevant to reaching a reasoned conclusion on the likely significant effects of the development described in the application in order to be an environmental statement, the relevant planning authority, Secretary of State or inspector as the case may be must notify the applicant or appellant in writing accordingly, and the applicant or appellant must provide that additional information”.

- 2.10 This EIA Statement of Conformity confirms that no ‘additional information’ is required to assist the local authority in reaching a reasoned conclusion on the assessment of likely significant effects. The points raised by the third party do not alter the assessment of likely significant effects as reported in the February 2025 ES and May 2026 ES Addendum, which remain valid and up to date.
- 2.11 Regulation 25 also states that the requirements of Regulation 25 also apply to “any other information” submitted by an Appellant. This is defined by the Regulations as “other substantive information relating to the environmental statement and provided by the applicant or the appellant as the case may be”. The information contained within this Statement is not substantive in nature and does not alter the assessment of likely significant effects are reported in the February 2025 ES and May 2026 ES Addendum. As stated, the February 2025 ES and May 2026 ES Addendum remain valid and up to date.

3 CONCLUSION

3.1 It is concluded that third party comments have been considered and do not give rise to any new or altered likely significant effects, nor alter the conclusions reached within the February 2025 ES and May 2026 ES Addendum. The changes have been considered in the context of the 2017 EIA Regulations and requirements of Schedule 4. This confirms that no further assessments are required. The February 2025 ES and May 2026 ES Addendum therefore remain valid and up to date.

3.2 Regulation 25 of the EIA Regulations states:

"in relation to which the applicant or appellant has submitted an environmental statement, and are of the opinion that, in order to satisfy the requirements of regulation 18(2) and (3), it is necessary for the statement to be supplemented with additional information which is directly relevant to reaching a reasoned conclusion on the likely significant effects of the development described in the application in order to be an environmental statement, the relevant planning authority, Secretary of State or inspector as the case may be must notify the applicant or appellant in writing accordingly, and the applicant or appellant must provide that additional information".

3.3 No 'additional information' which is 'directly relevant to reaching a reasoned conclusion on the likely significant effects of the development described in the application in order to be an environmental statement', is required to be submitted. The February 2025 ES and May 2026 ES Addendum remain valid and up to date and provides a thorough assessment in order for the Local Authority to reach a reasoned conclusion on likely significant environmental effects of the Proposed Development. In addition, the information contained within this Statement is not substantive in nature and does not alter the assessment of likely significant effects are reported in the February 2025 ES and May 2026 ES Addendum.

3.4 Given the above discussion, it can therefore be concluded that the third party comments do not alter the conclusions reached within the February 2025 ES and May 2026 ES Addendum. No additional information is therefore considered necessary in respect of the ES, which remains valid and up to date. Therefore, the

third party comments do not trigger the requirements of Regulation 25 of the EIA Regulations.

APPENDIX 1: Badger Risk Assessment

Date: 4th August 2026
Ref: 17-403-L6-1

BY Email

BADGER RISK ASSESSMENT

RYEBANK, CHORLTON

1. INTRODUCTION

E3P have been appointed as the Geoenvironmental Consultant by Step Places for the parcel of land known as Ryebank Fields, north of Longford Road, Chorlton. The planning application (Ref: 142223/FO/2025) is currently being determined.

This letter has been prepared to clarify a specific matter raised by an interested third party in correspondence sent directly to the Applicants.

It has been identified that badgers could, through natural burrowing and routine sett maintenance, bring fragments of asbestos-containing material (ACM) to the ground surface. If left unmanaged, such fragments could potentially become accessible, creating an exposure pathway through direct contact or disturbance.

In reviewing this potential risk, E3P has prepared a risk assessment, the findings of which are presented below.

2. RISK ASSESSMENT

Surveys have identified occasional fragments of asbestos cement within historically placed Made Ground adjacent to some of the setts. Current evidence indicates that badgers are exposing material already present locally within the soil rather than transporting ACM across the wider site.

The identified material predominantly comprises asbestos cement, within which asbestos fibres are firmly bound in a cement matrix. This has a significantly lower potential to release fibres than friable asbestos products, particularly where fragments remain intact and are not broken, cut or crushed. Nevertheless, visible fragments require appropriate management.

The proposed development provides an opportunity to reduce and control the existing risk. At present, the affected areas are not subject to a formal long-term inspection or management regime. If badgers expose ACM, there is limited provision for the material to be promptly identified and removed. Leaving the site in its current unmanaged condition would therefore retain a comparatively higher long-term risk profile.





The remediation works will remove visible ACM from accessible development areas and address the relevant source–pathway–receptor linkages. [REDACTED]

[REDACTED] The principal controls will comprise:

- ✧ [REDACTED]
[REDACTED]
- ✧ [REDACTED]
[REDACTED]
- ✧ [REDACTED]
- ✧ [REDACTED]
- ✧ Signage identifying the protected ecological areas and discouraging unauthorised access;
- ✧ Sensitive lighting and habitat design to maintain established badger corridors; and,
- ✧ Routine inspection by the public open space (POS) management company, with controlled removal of any suspect material brought to the surface.

[REDACTED]
[REDACTED] Permanent fencing will provide physical separation between future residents and the areas in which badger activity is concentrated.

[REDACTED]
[REDACTED] Permanent fencing effectively interrupts the final stage of the source-pathway-receptor linkage. Should a badger excavate ACMs within the retained habitat, residents would not have unrestricted access to the location because the fenced ecological area remains separate from private gardens and public amenity spaces. Consequently, any excavated material would remain within a managed ecological zone rather than an area routinely used by residents. The fencing also discourages informal access to woodland and sett areas where badger activity is concentrated. The Badger Monitoring Survey identified that badgers use established paths [REDACTED] particularly within retained woodland habitats. By restricting public access to these areas, the likelihood of residents encountering fresh spoil heaps generated by badgers is substantially reduced. Should ACM be exposed [REDACTED] it would remain within a confined, controlled and publicly inaccessible area rather than an area of routine public use. This substantially interrupts the potential pathway between the material and future residents.

The Joint Industry Working Group (JIWG) assessment demonstrates that the retained ACM does not present an unacceptable long-term risk to local residents, provided that the proposed access restrictions and management controls are implemented. Routine inspections will focus on [REDACTED] spoil heaps and other areas of active badger disturbance. If suspect material is identified, it can be promptly assessed and removed by appropriately trained personnel, supported by asbestos and ecological specialists where necessary. Any inspection or removal [REDACTED] will be undertaken under ecological supervision and in accordance with applicable badger protection requirements.

These measures provide a secured long-term control mechanism. Unlike the existing unmanaged condition, the development will establish clear responsibility for monitoring, reporting and undertaking remedial action. The combination of source control, restricted access, physical separation and ongoing management will prevent the completion of a viable source–pathway–receptor linkage to future residents.



The post-development risk will therefore be no greater than the current situation and in practice there will be an improvement and reduction in risk. The development allows the existing issue to be actively addressed through remediation and long-term management, whereas leaving the site in its present condition would retain a higher and uncontrolled long-term risk.

3. EIA REVIEW

The Ground Conditions Chapter of the Environmental Statement (ES) (Chapter 10) (February 2025) or ES Addendum (May 2026) submitted with the application assessed contamination risks using a source-pathway-receptor methodology in accordance with Land Contamination Risk Management (LCRM), with significance determined through consideration of receptor sensitivity and effect magnitude.

In the context of exposure to small quantities of ACMs from badgers from their natural burrowing [REDACTED], the receptor would be future residents or users of the POS areas. In accordance with the stated methodology set out in the ES, the receptor would be of high sensitivity.

However, the proposed development incorporates a comprehensive package of embedded and additional mitigation measures, including remediation of accessible ACMs, validated clean cover systems, habitat retention areas, permanent protective fencing, managed access routes and long-term ecological management, all of which can be secured through suitably worded planning conditions. These measures are set out in Chapter 10 (Ground Conditions) and Chapter 6 (Ecology) of the ES or ES Addendum and no new mitigation measures are required.

Furthermore, site observations indicate that badgers are not transporting material across the site but are only exposing isolated fragments [REDACTED]. Consequently, any potential effect would be highly localised, limited in spatial extent and of very low likelihood. In addition, the activity does not introduce a new contaminant, receptor or exposure pathway beyond those already considered within the Ground Conditions assessment. The possibility of ACM being present within the Made Ground, together with the associated human health risks and mitigation measures, has already been assessed within Chapter 10.

Applying the Environmental Statement significance criteria, the magnitude of any residual effect associated with badger excavation is considered negligible and would therefore result in a significance of effect of "None", even when considering a high-sensitivity receptor. The mitigation measures set out above are deliverable and can be secured by a suitably worded planning condition. As such, the conclusions of the Environmental Statement remain unchanged, and no new likely significant effect arises that would require further EIA assessment.

4. CONCLUSION

The potential for badgers to expose occasional fragments of asbestos cement does not make the proposed development or public open space unsuitable. Subject to implementation and maintenance of the proposed controls, the risk to future residents will remain low, controlled and below the existing baseline condition.

The scenario considered within this risk assessment represents a residual risk already encompassed within the contamination risk and mitigation framework assessed by the Ground Conditions chapter as part of the EIA, rather than a new or materially different environmental effect.



I trust this information is satisfactory to your requirements, and should I be able to be of any further assistance, please do not hesitate to contact me.

Yours sincerely,

Rebecca Hodnett
Associate Director

For and on behalf of E3P Ltd